

EXHIBIT A

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX**

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ALTHEA BEAZER,

Plaintiff,

-against-

**REBEKAH REHAB & EXTENDED CARE CENTER,
KENNETH GELB, CONNIE CAPALDO, and
IVAN RAMKHELAWAN-SIN,**

Defendants.
-----X

Index No.:

SUMMONS WITH NOTICE

**VENUE
BRONX COUNTY**

**BASIS OF VENUE
Defendants' Place of Business
and Where the Actions
Complained of Occurred**

TO THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiff's attorney, at the address stated below, a notice of appearance or demand for a complaint.

If this Summons with Notice was personally served upon you in the State of New York, the answer must be served within twenty (20) days after such service of the Summons with Notice, excluding the date of the service. If this Summons with Notice was not personally delivered to you within the State of New York, the answer must be served within thirty (30) days after service of this Summons with Notice is completed as provided by law.

PLEASE TAKE NOTICE THAT the nature of this action is employment discrimination on the basis of Plaintiff's gender and race; sexual harassment, hostile work environment, and retaliation for lawful complaints of harassment and discrimination; in violation of the New York State Human Rights Law; and the New York City Human Rights Law.

The relief sought is: an amount to be determined at trial but in no event less than Two Million Five Hundred Thousand Dollars (\$2,500,000.00) together with attorneys' fees and interest thereon.

PLEASE TAKE FURTHER NOTICE that if you do not serve a notice of appearance or demand for a complaint within the applicable time limitation stated above, a judgment will be entered against you, by default, for the sum of Two Million Five Hundred Thousand Dollars (\$2,500,000.00) together with interest, attorneys' fees and the costs and disbursements of this action.

The action will be heard in the Supreme Court of the State of New York, in and for the County of Bronx. The basis for the venue is Defendants' place of business and where the actions complained of occurred.

Dated: New York, New York
July 18, 2022

GODDARD LAW PLLC
Attorneys for Plaintiff

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